

ENVIRONMENTAL LAW GROUP

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May 19, 2017

Sent via Certified Mail

Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Blvd. (MI-9J)
Chicago, IL 60606-3590

Re: Freedom of Information Act ("FOIA") Request for Records Pertaining to
Freeway Dump Site, Cliff Road and I-35W, Burnsville, Minnesota
Superfund Site

Dear FOIA Officer:

Under the authority of the Freedom of Information Act, 5 U.S.C. § 552, and the regulations promulgated by the U.S. Environmental Protection Agency ("EPA") to implement the Act, this letter requests all information in the possession, custody, or control of U.S. EPA Region 5 that U.S. EPA has relied upon or will rely upon to support a liability claim under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA") against Kurt Manufacturing Company ("Kurt Manufacturing") with respect to the Freeway Dump Site located at Cliff Road and I-35W, Burnsville, Dakota County, Minnesota. This request includes the following:

- 1) All documents that support U.S. EPA's allegations that Kurt Manufacturing sent hazardous waste to the Freeway Dump Site.
- 2) All documents that support U.S. EPA's allegations that Kurt Manufacturing sent any waste, substance or material to the Freeway Dump Site.
- 3) All liability allocation documents (using volume or any other basis) prepared for the Freeway Dump Site by U.S. EPA (or its consultants), the Minnesota Pollution Control Agency ("MPCA") (or its consultants), potentially responsible parties identified by U. S. EPA or MPCA at the Freeway Dump Site, or by all three.

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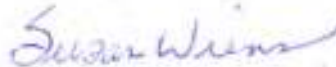
We agree to pay the FOIA statutory fees for the information requested in an amount not to exceed \$250.00. If costs will exceed that amount, please contact me.

Please direct your response to:

Ms. Susan Wiens
The Environmental Law Group
2263 Waters Drive
Mendota Heights, MN 55120

Thank you for your assistance with this request.

Very truly yours,


Susan K. Wiens